



The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

Bureau of Health Professions Licensure

Drug Control Program

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NOTICE

From: Department of Public Health, Medication Administration Program (MAP)
To: MAP Administrators and Coordinators
Date: April 1, 2020
Subject: COVID-19 – LOA Medication Supply Expansion

The COVID-19 public health emergency continues to produce an extraordinary demand on the Commonwealth's healthcare system. In light of the existing and impending shortage of licensed nurses and MAP Certified staff and the growing need to relocate individuals outside of their registered Medication Administration Program (MAP) Community Program, as defined in 105 CMR 700.001, without overburdening pharmacists, it has become extremely challenging for these Community Programs to comply with MAP Policy 11 *Leave of Absence*, which details requirements for medication transfers, packaging and administration during a leave of absence (LOA).

For the duration of the State of Emergency, declared by Governor Baker on March 10, 2020, the Department of Public Health's Drug Control Program (DCP), in consultation with the Department and the Department of Mental Health (DMH), the Department of Developmental Services (DDS), and the Department of Children and Families (DCF), is authorizing Community Programs to adhere to an alternative LOA process under the following circumstances.

For individuals who are "learning to self-administer," pursuant to MAP Policy 7, and are located at a "scattered" or "individual placement" sites, outside of a Group Living Environment (GLE):

- As an exception to MAP Policy 11-1(b), MAP Certified staff may prepare up to a seven day supply of the individual's medication in the manner outlined in MAP Policy 11-2 or in a medication organizer;
 - As an exception to MAP Policy 11-2(1)(a), a separate medication organizer for each individual medication is not required.
- At the time of administration, MAP Certified staff may provide a prompt to the individual by phone or other telehealth method;
- MAP Certified staff is responsible for verifying that medications were taken as directed at the time of each dose or by inspecting the returning supply, if any.

- Any medications remaining in a medication organizer at the time of the next re-packaging may not be returned to the Community Program, but must be disposed of in accordance with MAP Policy 10-5.

For individuals who are temporarily relocated to an unregistered site or GLE:

- As an exception to MAP Policy 11-1(b), MAP Certified staff may prepare up to a 14 day supply of the individual's medication in the manner outlined in MAP Policy 11-2 or in a medication organizer.
 - As an exception to MAP Policy 11-2(1)(a), a separate medication organizer for each individual medication is not required.
- It is also authorized for MAP Certified staff to provide up to the remaining supply of the individual's blister packaged medications;
 - The supply of medication needed may not exceed the individual's current remaining supply;
 - If the period of the individual's temporary relocation will exceed the remaining supply, the Community Program should prepare an additional transfer of packaged medications for the remainder of the LOA upon the Community Program's receipt of the individual's refilled orders.
- Once transferred to the relocation site, it is expected that any LOA medications will be administered by a person authorized to administer to the relocated individual, in accordance with § 9 of M.G.L. c. 94C, *the Massachusetts Controlled Substances Act*, and 105 CMR 700, *Implementation of M.G.L. c. 94C*.
- If the individual returns to the registered Community Program sooner than anticipated, Community Programs can accept the medications back into the Community Program only if they are stored in tamper resistant packaging (blister packaging).
 - In such cases, the contents of the blister pack must be verified by a licensed health care professional or the pharmacy prior to accepting it back into the Community Program.
 - Bottles of pills or liquids cannot be returned to the Community Program and must be disposed of in accordance with MAP Policy 10-5.

MAP Certified staff must strictly adhere to MAP Policies on documentation of the chain of custody of the medications using medication transfer and transport documentation procedures typically used between MAP Community Programs in accordance with MAP Policy 10-10, and for LOA, MAP Policy 11-3, including the completion of a transfer form upon transfer and return. Failure to do so may result in questions related to possible diversion of medications.

If you have any questions please contact your DDS, DMH or DCF MAP Coordinator for further guidance.

NOTE: This Notice expands upon and supersedes the March 16, 2020 Department of Public Health-MAP notice entitled *COVID-19 – LOA Medication Supply Exception*.